

Kenneth M. Gutsch, ABA 8811186
RICHMOND & QUINN
360 "K" Street, Suite 200
Anchorage, Alaska 99501
Telephone: (907) 276-5727
Facsimile: (907) 276-2953
Email: kgutsch@richmondquinn.com
Attorneys for Defendant
Wal-Mart Stores, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT FAIRBANKS

JUANITA N. AKINS,)	
)	
Plaintiff,)	
)	
v.)	
)	
WAL-MART STORES, INC., d/b/a)	
SAM'S CLUB OF FAIRBANKS, STORE)	Case No. 4:12-cv- ____ - ____
#6603,)	
)	
Defendant.)	
_____)	

NOTICE OF REMOVAL

TO: The United States District Court
For the District of Alaska

AND TO: Juanita N. Akins
379 Division St. #10
Fairbanks, AK 99712

You are hereby notified that, pursuant to 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446, the above defendant, Wal-Mart Stores, Inc., d/b/a Sam's Club has this day filed in the United States District Court for the District of Alaska this Notice of Removal of the

following action: Juanita N. Akins v. Wal-Mart Stores, Inc., et al., filed in the Superior Court for the State of Alaska, Fourth Judicial District at Anchorage, Case No. 4FA-12-01864 CI. You are also notified that the said defendant has filed a copy of this Notice with the Clerk of the Superior Court for the Fourth Judicial District at Fairbanks, and that said action has thereby been removed from the Superior Court to the United States District Court. See Exhibit A (“Notice of Removal to United States District Court” w/o attachments).

The grounds for removal are as follows: Complete diversity of citizenship. 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446. Plaintiff is a resident and citizen of the State of Alaska (Ex. B, Complaint at ¶ 1). Defendant Wal-Mart is a Delaware corporation whose principal place of business is in Arkansas.

Suit was filed by plaintiff in Alaska Superior Court, Fourth Judicial District at Fairbanks, on or about June 15, 2012. Plaintiff’s complaint alleges a claim for damages in excess of \$100,000.

Summons was served on defendant on June 18, 2012. This removal is being filed within thirty (30) days after service of process.

Based on the above, this court has removal jurisdiction over this action, and defendant is entitled to remove this action to this Court from the Superior Court for the State of Alaska.

NOTICE OF REMOVAL

AKINS v. WAL-MART STORES, INC., et al., Case No. 4:12-cv-_____-____

Page 2

DATED this 9th day of July, 2012, at Anchorage, Alaska.

RICHMOND & QUINN

By: /s/ Kenneth M. Gutsch, , ABA 8811186
360 "K" Street, Suite 200
Anchorage, Alaska 99501
Telephone: (907) 276-5727
Facsimile: (907) 276-2953
Email: kgutsch@richmondquinn.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy
of the foregoing was served by mail this 9th day of
July, 2012 on:

Juanita N. Akins
379 Division St. #10
Fairbanks, AK 99712

/s/ Kenneth M. Gutsch
RICHMOND & QUINN
2245\045\PLD\Removal from State Court

NOTICE OF REMOVAL
AKINS v. WAL-MART STORES, INC., et al., Case No. 4:12-cv-_____ -_____
Page 3